

Exhibit A

Approved, SCAO

Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - Return

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE	SUMMONS	CASE NO. 2021- NI 21-000122-NI
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Court address

101 E. Huron, Ann Arbor, MI 48107

JUDGE PATRICK J. CONLIN, JR.

Court telephone no.

734-222-3383

 Plaintiff's name(s), address(es), and telephone no(s).
 Annette Robinson

v

 Defendant's name(s), address(es), and telephone no(s).
 Jan Stasik and Reliable Transportation Specialists, Inc.

 Reliable Transportation Specialists, Inc.
 139 Venturi Dr.
 Chesterton, IN 48304

 Plaintiff's attorney, bar no., address, and telephone no.
 Paul S. Clark (P39164)
 Law Office of Paul S. Clark, P.C.
 801 Livernois, Ferndale, MI 48220
 (248) 543-7776

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

 been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____.

 The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date* 05-03-2021	Court clerk /s/ Kim Plumba 2/1/2021
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*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

SUMMONS**PROOF OF SERVICE**

Case No.2021-

TO PROCESS SERVER: You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

CERTIFICATE / AFFIDAVIT OF SERVICE / NONSERVICE☐ **OFFICER CERTIFICATE**

OR

☐ **AFFIDAVIT OF PROCESS SERVER**

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

Being first duly sworn, I state that I am a legally competent adult, and I am not a party or an officer of a corporate party (MCR 2.103[A]), and that: (notarization required)

- ☐ I served personally a copy of the summons and complaint,
☐ I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint,

together with _____

List all documents served with the summons and complaint

_____ on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

- ☐ I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee	Miles traveled	Fee	
\$		\$	
Incorrect address fee	Miles traveled	Fee	TOTAL FEE
\$		\$	\$

Signature _____

Name (type or print) _____

Title _____

Subscribed and sworn to before me on _____, _____ County, Michigan.
 Date

My commission expires: _____ Signature: _____
 Date Deputy court clerk/Notary public

Notary public, State of Michigan, County of _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of the summons and complaint, together with _____
 Attachments

_____ on _____
 Day, date, time

Signature _____ on behalf of _____

Approved, SCAO		Original - Court 1st copy - Defendant	2nd copy - Plaintiff 3rd copy - Return
STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE	SUMMONS	CASE NO. 2021- NI 21-000122-NI	
Court address 101 E. Huron, Ann Arbor, MI 48107		Court telephone no. JUDGE PATRICK J. CONLIN, JR. 734-222-3383	
Plaintiff's name(s), address(es), and telephone no(s). Annette Robinson		Defendant's name(s), address(es), and telephone no(s). Jan Stasik and Reliable Transportation Specialists, Inc. Jan Stasik 8112 Thomas Street Justice, IL 60458	
Plaintiff's attorney, bar no., address, and telephone no. Paul S. Clark (P39164) Law Office of Paul S. Clark, P.C. 801 Livernois, Ferndale, MI 48220 (248) 543-7776		v	

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Issue date	Expiration date*	Court clerk
	05-03-2021	

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SUMMONS

Case No.2021-

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OR

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Being first duly sworn, I state that I am a legally competent adult, and I am not a party or an officer of a corporate party (MCR 2.103[A]), and that: (notarization required)

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I declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$

Signature

Name (type or print)

Title

Subscribed and sworn to before me on _____, _____ County, Michigan.
 Date

My commission expires: _____ Date Signature: _____
 Deputy court clerk/Notary public

Notary public, State of Michigan, County of _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of the summons and complaint, together with _____ Attachments

_____ on _____
 Day, date, time

_____ on behalf of _____
 Signature

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WASHTENAW

ANNETTE ROBINSON,

21-000122-NI

Plaintiff,

Case No: 2021-

NI

JUDGE PATRICK J. CONLIN,
JR.

v.

JAN STASIK and
RELIABLE TRANSPORTATION SPECIALISTS, INC.

Defendants.

Paul S. Clark (P39164)
Law Office of Paul S. Clark, P.C.
Attorneys for Plaintiff
801 Livernois
Ferndale, MI 48220
(248) 543-7776

COMPLAINT

There is no other pending or resolved civil action arising out of the transaction or occurrence alleged in the complaint.

NOW COMES the Plaintiff, Annette Robinson, by and through her attorneys, Law Office of Paul S. Clark P.C. and for her Complaint, states:

1. Plaintiff is a resident of Jackson County, Michigan.
2. Defendant Jan Stasik is a resident of Justice, Illinois, and was driving his work vehicle during the course of his employment, with knowledge, consent, and permission of the owner of the vehicle, her employer Reliable Transportation specialists, Inc.
3. Defendant Reliable Transportation Specialists, Inc. has its principal place of business in Chesterton, Indiana.
4. Jurisdiction exists in this court pursuant to Michigan's Long Arm Statute found at MCL 600.715 (2) because of an automobile collision that occurred on April 12, 2018, at approximately 8:20 am. in Washtenaw County, Michigan, on Eastbound M-14 near the intersection of US 23.

5. The amount in controversy is within the jurisdiction of this court because Plaintiff claims damages in excess of \$25,000.

6. At all relevant times, Defendant Jan Stasik was the driver of the 2001 Volvo TT bearing the 2018 Illinois license number P622984, which was owned by Defendant Reliable Transportation Specialists, Inc. at the time of this collision.

7. At the time of the collision, Plaintiff was the driver of a 2010 Nissan Altima automobile bearing the 2018 Michigan license number ACK 991.

8. The vehicle Plaintiff was driving was traveling east on M-14 in the right lane.

9. At that time and place, Defendant Jan Stasik attempted to merge into the right lane and struck the driver's side of Plaintiff's vehicle.

10. Defendant Jan Stasik owed Plaintiff the following duties of care:

a. to operate the motor vehicle on the roadway in a manner and at a rate of speed that would permit it to be stopped within a safe distance, MCL 257.627(1)

b. not to operate the vehicle carelessly and heedlessly with willful and wanton disregard for the safety and rights of others, MCL 257.626(2)

c. to keep the automobile constantly under control

d. to attempt to stop the vehicle when Defendant knew or should have known that failure to do so would naturally and probably result in injury to Plaintiff

e. to observe the highway in front of Defendant's vehicle when Defendant knew or should have known that failure to observe Plaintiff's oncoming vehicle would endanger the life or property of other persons using the roadway

f. to come to a full stop before entering the roadway from a private road or driveway and to yield to all approaching vehicles, MCL 257.652

g. to keep a proper lookout before changing lanes.

11. As a direct and proximate result of the breach of Defendant driver's duties, the collision occurred, and the injuries stated in this complaint resulted.

12. As a direct and proximate result of the negligence of Defendant Jan Stasik, Plaintiff suffered serious injuries and may in the future suffer or may permanently suffer mental anguish, pain and suffering, injuries, and limitations, including serious impairment of body function or permanent or serious disfigurement and aggravation of any preexisting conditions. Plaintiff's damages include, but are not limited to, the following injuries:

- a. serious injuries to her back, neck, and other parts of her body as well as other related and appreciable difficulties, injuries, or consequences that have occurred, developed, or aggravated any preexisting problem that might have existed
- b. pain, suffering, and mental anguish
- c. wage loss or actual future loss of earnings to the extent that such losses are recoverable in excess of the no-fault statutory monthly and yearly maximums that are found to apply to the cause
- d. other damages, injuries, and consequences that are found to be related to the automobile accident that developed during the course of discovery, to the extent that the damages are recoverable under the Michigan No-Fault Insurance Act

OWNER'S CONSENT

13. Plaintiff realleges paragraphs 1 through 12 as though fully restated herein.

14. Defendant Reliable Transportation Specialists, Inc. owned the vehicle Defendant Stasik was driving at the time of the collision.

15. Pursuant to MCL 257.401(1), Defendant Reliable Transportation Specialists, Inc. is liable for the negligent acts or omissions of its' employee and driver, Jan Stasik, who was driving in the course of her employment, and with Reliable's consent.

16. As a direct and proximate cause of Defendant Stasik's negligence, Plaintiff was injured as more fully described above.

RELIEF REQUESTED

WHEREFORE, Plaintiff asks the Court to award damages against Defendants in whatever amount Plaintiff is found to be entitled to in excess of \$25,000, plus interest, costs, and attorney fees.

LAW OFFICE OF PAUL S. CLARK, P.C.

By /s/ Paul S. Clark
Paul S. Clark (P39164)
Attorneys for Plaintiff
801 Livernois
Ferndale, MI 48220
(248) 543-7776

Date: February 1, 2021